

EXHIBIT C

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Hausfeld: Global Litigation Solutions Firm Resume

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Hausfeld is “the world’s leading antitrust litigation firm.”

– Politico

Hausfeld Firm Summary

In the last decade, Hausfeld attorneys have won landmark trials, negotiated complex settlements among dozens of defendants, and recovered billions of dollars in cartel recoveries for clients both in and out of court. Renowned for skillful prosecution and resolution of complex and class-action litigation, Hausfeld is the only claimants’ firm to be ranked in the top tier in private enforcement of antitrust/competition law in both the United States and the United Kingdom by the Legal 500.

From our locations in Washington, D.C., New York, Philadelphia, San Francisco, Berlin, Boston, Brussels, and London, Hausfeld contributes to the development of law in the United States and abroad in the areas of antitrust/competition, consumer protection, environmental threats, human and civil rights, mass torts, and securities fraud. Hausfeld attorneys have studied the global integration of markets—and responded with innovative legal theories and a creative approach to claims in developed and emerging markets.

Hausfeld was founded by Michael D. Hausfeld, who is widely recognized as one of the country’s top civil litigators and a leading expert in the fields of private antitrust/competition enforcement and international human rights. The New York Times has described Mr. Hausfeld as one of the nation’s “most prominent antitrust lawyers,” while Washingtonian Magazine characterizes him as a lawyer who is “determined to change the world—and succeeding,” noting that he “consistently brings in the biggest judgments in the history of law.”

Antitrust and Competition Litigation

Hausfeld’s reputation for leading groundbreaking antitrust class actions in the United States is well-earned. Having helmed more than thirty antitrust class actions, Hausfeld attorneys are prepared to **litigate and manage cases with dozens of defendants** (*In re Blue Cross Blue Shield Antitrust Litigation*, with more than thirty defendants), **negotiate favorable settlements for class members and clients** (*In re Air Cargo Shipping Services Antitrust Litigation*, settlements of more than \$1.2 billion), take on the financial services industry (*In re Foreign Exchange Antitrust Litigation*, with settlements of more than \$2 billion), **take cartellists to trial** (*In re Vitamin C Antitrust Litigation*, trial victory of \$162 million against Chinese manufacturers of vitamin C), and **push legal boundaries where others have not** (*In re NCAA Antitrust Litigation*, another trial victory in which the court found the NCAA rules prohibiting payment of players to be unlawful).

Consumer Protection Litigation

Hausfeld also pursues consumer protection, defective product, and Lanham Act cases on behalf of a variety of litigants including consumers, entertainers, financial institutions, and other businesses. For example, we obtained class-wide settlements for purchasers of **defective Acer laptops** (*Wolph v. Acer America Corp.*) and **victims of unfair and deceptive practices** (*Radosti v. Envision EMI, LLC* and *In re Tyson Foods, Inc., Chicken Raised Without Antibiotics Consumer Litigation*); and sought compensation for domestic beekeepers and honey packers for **fraudulent mislabeling** of imported honey (*In re Honey Transshipping Litigation*).

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Hausfeld Firm Summary

continued

Financial Services

Hausfeld has been at the forefront of numerous class actions against the financial services industry since 2009, pursuing wrongful conduct that spans the globe. Hausfeld leads two of the largest class actions against the world's biggest banks for manipulation of prices paid in the **Libor** and foreign exchange (**Forex**) markets, in which they obtained **more than \$2 billion in settlements for the class**.

Mass Tort and Environmental Litigation

Hausfeld attorneys have pursued wide-ranging mass tort cases over the last decade. We have represented **homeowners with defective drywall** (*In re Chinese-Manufactured Drywall Products Liability Litig.*), former **football players who suffered from the long-lasting effects of concussions** (*In re National Football League Players' Concussion Injury Litigation*) **mine workers in southern Africa who contracted silicosis** from their workplace environment – the first case of its kind brought in South Africa, and **victims of dangerous prescription drugs and medical devices**, including women whose hormone replacement therapy caused them to suffer from breast cancer (*In re Prempro Products Liability Litigation*), and patients with defective hip replacements (*In re Stryker Rejuvenate and ABG II Hip Implant Products Liability Litigation*).

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“Hausfeld stands out for its ability to provide worldwide solutions, leveraging its network of offices across the US and in Europe.”

– The Legal 500 2016

Hausfeld: A Global Reach

Hausfeld’s international reach enables it to advise across multiple jurisdictions and pursue claims on behalf of clients worldwide. Hausfeld works closely with clients to deliver outstanding results, while always addressing their business concerns. Hausfeld does so by anticipating issues, considering innovative strategies, and maximizing the outcome of legal disputes in a way that creates shareholder value. Its inventive cross border solutions work to the benefit of the multinational companies it often represents.

Creative Solutions to Complex Legal Challenges

Hausfeld lawyers consistently apply forward-thinking ideas and creative solutions to the most vexing global legal challenges faced by clients. As a result, the firm’s litigators have developed numerous innovative legal theories that have expanded the quality and availability of legal recourse for claimants around the globe that have a right to seek recovery. Hausfeld’s impact was recently recognized by the *Financial Times*, which awarded Hausfeld the “Most Innovative Law Firm in Dispute Resolution of 2013,” as well as by the *Legal 500* who has ranked Hausfeld as the only top tier claimants firm in private enforcement of antitrust/competition law in both the United States and the United Kingdom. For example, the landmark settlement that Hausfeld negotiated to resolve claims against Parker ITR for antitrust overcharges on marine hose represented the first private resolution of a company’s global cartel liability without any arbitration, mediation, or litigation – creating opportunities never before possible for dispute resolution and providing a new model for global cartel settlements going forward.

Unmatched Global Resources

The firm combines its U.S. offices on both coasts and vibrant European presence with a broad and deep network around the globe to offer clients the ability to seek redress or confront disputes in every corner of the world and across every industry. With over 70 lawyers in offices in Washington, D.C., New York, Philadelphia, San Francisco, Berlin, Boston, Brussels, and London, Hausfeld is a “market leader for claimant-side competition litigation.”

The Hausfeld Firm

Hausfeld's Experience is Unparalleled

Hausfeld Firm has served in court-appointed leadership positions in over 60 anti-trust, mass tort, consumer protection, and human rights cases. Hausfeld is, thus, very familiar and highly experienced with fulfilling the attorney, staff, expert, and financial commitments required in such cases and with working cooperatively with others, as is necessary in a large MDL, such as this one. Hausfeld has a long and successful track record of litigating complex cases from inception to trial and have won numerous accolades from commentators and courts for our work on behalf of plaintiffs. The *National Law Journal*, which has repeatedly named the firm to the "Plaintiffs' Hot List," recently designated Hausfeld as one of a select group of America's Elite Trial Lawyers, determined by "big victories in complex cases that have a wide impact on the law and legal business." Hausfeld's 2014 trial victory in *O'Bannon v. National Collegiate Athletic Association* ("O'Bannon") was recently named the *Global Competition Review's* Litigation of the Year for both Cartel and Non-Cartel Prosecution.

Hausfeld – Mass Tort Experience

Hausfeld lawyers have achieved notable success in representing clients injured by unsafe drugs, faulty medical devices, and other defective products.

Lawyers from Hausfeld have litigated many of the most important mass tort cases in the last decade, including diet drugs Redux and Pondimin (commonly referred to as the fen-phen litigation), resulting in a \$3.75 billion settlement and medical monitoring for millions of U.S. consumers. Hausfeld lawyers also successfully obtained settlements on behalf of women who took hormone replacement therapy ("HRT"), which is known to cause breast cancer.

Recently, Hausfeld lawyers have achieved class action settlements for thousands of homeowners in the Gulf and Atlantic coast states who own homes built with defective Chinese Drywall which emits excess sulfur and endangers the health and safety of residents. Hausfeld continues to represent Chinese Drywall plaintiffs against other defendants, and in the areas of pharmaceutical and medical device litigation, the firm represents consumer actions in GranuFlo (a dialysis filtration product made by Fresenius), IVC filters (post-surgical filters used to prevent clots made by Bard PV), Zofran (a drug used for morning sickness made by GlaxoSmithKline), Stryker artificial hips, Invokana (a type-2 diabetes drug used to control high blood sugar and made by Janssen Pharmaceuticals, Inc. and Johnson & Johnson), Talcum Powder (a feminine hygiene product associated with ovarian cancer made by Johnson & Johnson), and Bair Hugger (a surgical forced-air warming unit that increases the risk of surgical infection made by 3M company).

Representative Highlights

(1) *In re StarLink Products Liability Litig.*, MDL 1403 (N.D. Ill.) (Co-lead, before the Honorable Judge James B. Moran)

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(2) *In re Phenylpropanolamine Products Liability Litig.*, MDL 1407 (W.D. Wash.)(Co-lead, before the Honorable Judge Barbara Jacobs Rothstein)

(3) *In re Diet Drugs Products Liability Litig.*, MDL 1203 (E.D. Pa.) (Class Counsel, before the Honorable Judge Harvey Bartle III)

(4) *In re Prempro Products Liability Litig.*, MDL 1507 (E.D. Ark.) (Steering Committee, before the Honorable Judge Billy Roy Wilson)

(5) *In re National Football League Players' Concussion Injury Litig.*, MDL 2323 (E.D. Pa.) (Executive Committee, before the Honorable Judge Anita B. Brody)

(6) *In re Chinese-Manufactured Drywall Products Liability Litig.*, MDL 2047 (E.D. La.) (Of Counsel to PSC and Member of Court-Appointed Allocation Committee, before the Honorable Judge Eldon E. Fallon)

(7) *In re Stryker Rejuvenate* (MDL No. 13-2441) (DWF/FLN) (PSC, before Honorable Donovan W. Frank)

(8) *In re National Collegiate Athletic Association Student-Athlete Concussion Injury Litig.*, (MDL No. 13-9116) (Executive Committee and Court-appointed Special Counsel for Medical Monitoring Relief before the Honorable John Z. Lee (N.D. Ill.)).

(9) *In re Fresenius Granflo/Naturalyte Dialysis Products Liability Litig.*, (MDL No. 2428) (Member of *Daubert* Committee, before Honorable Judge Woodlock (D. Mass.)).

(10) *In re Bair Hugger Forced Air Warming Products Liability Litig.*, (MDL No. 2666) (JNE/FLN) (Member of PSC, before the Honorable Judge Joan N. Ericksen (D. Minn.)).

(11) *In re Zofran (Ondansetron) Products Liability Litig.*, (MDL 2657) (FDS) (Member of PSC, before the Honorable Judge Dennis Saylor IV (D. Mass.)).

Individual Qualifications of Steve Rotman

Steve Rotman has over thirty years of experience in the practice of law. For the last ten years his practice has focused on pharmaceutical product liability litigation. Prior to that Steve's practice encompassed personal injury, product liability, constitutional law litigation, and commercial litigation, both on the defense and plaintiff sides. Steve has experience with trials in state and federal courts, with AAA arbitrations, mediations, and appeals in state and federal courts. He has tried alone or with others, three pharmaceutical products cases, two medical malpractice cases, a medical device case, several construction cases, and several commercial cases.

Over the course of his career, Steve has concentrated on pharmaceutical product liability litigation, representing plaintiffs who suffered devastating injuries or loss of life from unreasonably dangerous drugs. He has served on discovery and science committees, or performed common benefit work in six pharmaceutical and medical device multi-district litigations (PPA, Diet Pill, HRT, Pradaxa, Mirena, and Fresenius).

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In the PPA litigation (decongestants associated with hemorrhagic stroke) (2000-2006), Steve was principally responsible for the MDL general causation *Daubert* briefing and general causation expert witness work. He took multiple depositions of defense liability witnesses and MDL causation experts in the fields of epidemiology and stroke neurology.

In HRT (2007-2012), Steve contributed to common benefit work regarding *Daubert* issues, safer alternative science development, recruitment of case specific causation, cell biology and epidemiology experts, and I was primarily responsible for negotiating an aggregate settlement. For individual HRT cases (2007-2012), he handled all causation witnesses in two federal court trials (one settled post defense verdict; one plaintiffs' verdict resulting in a \$4 million compensatory award and punitive damages to be determined by the judge (pending)). Steve also recruited experts in oncology, pathology, cell biology, radiology, and epidemiology, and took or defended over 80 depositions. Steve was principally responsible for all *Daubert* and expert witness issues in the firm's 104 case inventory.

Steve continued to focus on pharmaceutical product liability litigation from 2007 through 2012 as an equity partner in the firm Bubalo Rotman PLC. The pharmaceutical cases included lawsuits concerning diet pills associated with heart and lung disease; hormone therapy associated with breast cancer; pain patches associated with sudden death; Cox-2 inhibitor pain medications associated with heart attacks; Yaz birth control pills associated with clotting injuries, and Paxil birth defect cases. That representation has involved extensive work with experts in the fields of epidemiology, pharmacology, toxicology, neurology, neurosurgery, neuropsychology, oncology, radiology, cardiology, pathology, life care planning, physical therapy, and economics. These cases also entailed the review and analysis of documents obtained in discovery, both in hard copy and in electronic databases.

In the *Fresenius* litigation, (2014-present), Steve, along with his partner, Richard Lewis, have served as a member of the *Daubert* committee and have done significant work finding and preparing expert witnesses (in the areas of epidemiology, general, and specific causation), drafting multiple *Daubert* briefs, and arguing *Daubert* motions before the Honorable Judge Woodlock of the United States District Court for the District of Massachusetts, and the Honorable Maynard Kirpalani of the Superior Court of the Commonwealth of Massachusetts.

Recently, Steve has worked with an expert biostatistician versed in IVC science, to develop a report based on an analysis of the adverse events, as well as with cardiology/ epidemiology expert on risks, signals, and studies. Steve has also worked with a vascular surgeon to set forth the need for medical monitoring of implanted IVC filters, the rationale for monitoring, and the type of monitoring that is required.

Steve served as Chair of the *Daubert* / Expert Witness Admissibility litigation group of the American Association for Justice (AAJ) and was awarded a Medal for Excellence for service to AAJ. He has been invited to speak at local Bar Association and national legal conferences on the subjects of electronic evidence, medical evidence, and proving causation in pharmaceutical cases.

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Steve is a member in good standing of the Bars of Massachusetts and District of Columbia. He has been admitted to the Bars of United States District Courts in Massachusetts and the District of Columbia, and to the First Circuit Court of Appeals. Steve has also been admitted *pro hac vice* to the Bars of several states. He is a member of the Litigation Section of the Massachusetts and Boston Bar Associations.

Other Firm Resources

Richard Lewis

Richard Lewis has over 25 years of experience leading and litigating mass tort and class action cases, including substantial experience litigating public health cases including medical device and pharmaceutical liability cases. He has served as Co-Lead Counsel, Class Counsel, or Executive/Steering Committee Member in several such cases in federal courts, with a particular emphasis on issues related to expert witnesses and complex litigation briefing.

Mr. Lewis has also litigated and tried several complex mass tort cases in state courts, including *Bowman v. Mark Midei, M.D., et al.* (case involving cardiac stents), *Harman v. Nick Lipari, et al.* (medical monitoring class action against landfill), and *City of Milwaukee v. NL Industries, Inc.* (city seeking lead paint abatement costs). Outside of the United States, he is currently assisting South African Counsel in litigating a class action case in South Africa on behalf of South African gold miners who developed lung diseases from prolonged exposure to mining silica dust.

James Gotz

For over twenty years, James has represented clients both locally in Massachusetts and nationally in complex tort litigation, ranging from standalone catastrophic injury due to negligence and medical malpractice, to individual product liability actions and pharmaceutical/medical device mass torts. He has tried to verdict, as first chair, over a dozen jury cases in Massachusetts state and federal courts, including *Dodge v. Tezel* (Suffolk Superior Court), which remains the largest state verdict in a pedestrian versus vehicle negligence case, in excess of sixteen million dollars. He has also overseen the prosecution and multi-million dollar resolution of several complex wrongful death actions, from automotive product liability, to day care center wrongful death, to medical malpractice.

In addition to his stand-alone complex tort practice, James has been a leader in pharmaceutical and medical device mass torts, including most recently his management of the *GranuFlo* MDL litigation in Boston. Working in collaboration with Plaintiff's lead counsel for the state court consolidated litigation, he oversaw and managed all aspects of the mass tort.

Megan Jones

Megan Jones, a nationally recognized litigator and skilled ESI negotiator, is frequently called upon to lead complex ESI negotiations and to speak at national ESI training events. Ms. Jones, a member of the Sedona Conference, regularly writes on the topic of e-discovery. She is a co-author of The Sedona Conference's highly

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regarded *Glossary: E-Discovery and Digital Information Management* (Dec. 2007) as well as its publication, *Navigating the Vendor Proposal Process*. Her commentary has been published in leading trade and legal journals such as *Law Technology News*, *The National Law Journal*, and the *Federal Courts Law Review*. Ms. Jones has testified before the Federal Rules Committee on electronic discovery, participates in high-level legal gatherings such as the invitation-only Duke Law Conference on Implementing Discovery Proportionality Standard, and frequently speaks at leading national ESI conferences, such as the ABA's National E-Discovery Institute and Sedona Conference educational conferences.

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Over the course of his career, Steve has concentrated on pharmaceutical product liability litigation, representing plaintiffs who suffered devastating injuries or loss of life from unreasonably dangerous drugs. He has served (and currently serves) on discovery and science committees, or performed common benefit work in several pharmaceutical and medical device multi-district litigations. (*e.g.*, *In re Zofran Products Liability Litigation*; *In re: Phenylpropanolamine (PPA) Products Liability Litigation*; *Pradaxa Products Liability Litigation*; *In re Hormone Replacement Therapy Litigation*; *In re Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation*; *Mirena IUD Products Liability Litigation*; and *In re Diet Drugs*).

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STEVE ROTMAN

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Steve currently serves on the court-appointed Plaintiffs Steering Committee in *In re Zofran Products Liability Litigation* (MDL No. 2657) before the Honorable Judge F. Dennis Saylor IV of the United States District Court for the District of Massachusetts. He is co-chair of the science and expert committee in that litigation. Additionally, in the *In re Fresenius Granuflo/Naturalyte Litigation* (MDL No. 2428), Steve serves as a member of the *Daubert* committee and has conducted significant work finding and preparing expert witnesses (in the areas of epidemiology, general, and specific causation), drafting multiple *Daubert* briefs, and arguing *Daubert* motions before the Honorable Judge Woodlock of the United States District Court for the District of Massachusetts, and the Honorable Maynard Kirpalani of the Superior Court of the Commonwealth of Massachusetts.

Steve served as Chair of the *Daubert* / Expert Witness Admissibility litigation group of the American Association for Justice (AAJ) and was awarded a Medal for Excellence for his service to AAJ. He has been invited to speak at local Bar Association and national legal conferences on the subjects of electronic evidence, medical evidence, and proving causation in pharmaceutical cases.

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Richard Lewis has been appointed to serve as co-lead counsel in mass tort and product liability class action cases including *In re StarLink Corn Products* (N.D. Ill) (asserting claims by farmers for genetic modification contamination of the U.S. corn supply) and *In re PPA* (asserting claims by users of unsafe over-the-counter medicines). He has also been appointed to the MDL Steering Committee in *In re Prempro Products Liability Litigation*, *In re NFL Players' Concussion Injury Litigation*, *In re Stryker Rejuvenate And ABG II Hip Implant Products Liability Litigation*, *In re Bair Hugger Forced Air Warming Products Liability Litigation*, and in *In re Chinese Manufactured Drywall Products Liability Litigation*. Rich was a member of the Chinese Drywall trial team that obtained a comprehensive remediation and property damages verdict for seven Virginia homeowners. Furthermore, Rich handled various experts in the Daubert briefing and argument; and was successful in excluding significant portions of the defense experts' opinions.

In addition, Rich served or presently serves as lead counsel or class counsel in numerous actions to obtain medical monitoring and property damage relief for communities exposed to toxic chemicals, unsafe working conditions, or unsafe drugs. These include the *In re NFL Concussion Injury Litigation*, *In re NCAA Concussion Litigation*, and *In re Diet Drug Litigation* (Fen-Phen), which resulted in a \$4 billion settlement providing medical monitoring in addition to individual personal injury awards. In addition, these include *Farnum v. Shell*, an oil spill pollution case in Barbados against international oil companies, that resulted in a settlement providing property damage compensation for 26 farmers and landowners, and *Harman v. Lipari*, a Superfund case that resulted in a settlement providing medical monitoring for thousands of residents who lived on or played near a landfill. He has litigated both individual and class childhood lead poisoning cases and is also handling environmental and workplace safety cases in India, and South Africa.

Rich also practices in the environmental health area and presently assists South African counsel in representing a certified class of South African gold miners bringing claims for lung disease against the South African mining industry, as well as residents in Los Angeles and St. Louis bringing claims for methane gas pollution and radiation contamination, respectively.

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Whether representing the families and victims of catastrophic injury, leading other plaintiff counsel in mass torts, engaging with opposing counsel or interacting with judges, James is known for, and takes pride in doing each with all his attention. No matter how challenging or adversarial the situation, James remains mindful, calm and considerate to secure the greatest possible success in his cases. His consistent winning results prove the value of his uniquely attentive approach. James seeks out the most challenging of situations in which to contribute his complex tort and mass tort experience.

For over twenty years, James has represented clients both locally in Massachusetts and nationally in complex tort litigation, ranging from standalone catastrophic injury due to negligence and medical malpractice, to individual product liability actions and pharmaceutical/medical device mass torts. He has tried to verdict, as first chair, over a dozen jury cases in Massachusetts state and federal courts, including *Dodge v. Tezel* (Suffolk Superior Court), which remains the largest state verdict in a pedestrian versus vehicle negligence case, in excess of sixteen million dollars. He has also overseen the prosecution and multi-million dollar resolution of several complex wrongful death actions, from automotive product liability, to day care center wrongful death, to medical malpractice.

In addition to his stand-alone complex tort practice, James has been a leader in pharmaceutical and medical device mass torts, including most recently his management of the GranuFlo MDL litigation in Boston. Working in collaboration with Plaintiff's lead counsel for the state court consolidated litigation, he oversaw and managed all aspects of the mass tort.

In recognition of his skills as a trial lawyer, James was invited to participate as a faculty member for Harvard Law School's Annual Trial Advocacy Workshop from 2009-2011 and 2014-2015.